

# EXHIBIT A-4

## Defense of Libby Access Case - 00301

Name	Position	Hourly Rate	TOTAL HOURS BILLED			
			July	August	September	Total Comp.
Lund, Kenneth	Partner	\$ 350.00	0	0	1	\$ 350.00
<b>TOTAL</b>			<b>0</b>	<b>0</b>	<b>1</b>	<b>\$ 350.00</b>

**Defense of Libby Access Case - 00301**

<b>Description</b>	<b>July</b>	<b>August</b>	<b>September</b>	<b>Total</b>
Photocopies				\$ -
Facsimilies				\$ -
Long Distance Telephone				\$ -
Outside Courier				\$ -
Travel Expenses				\$ -
Lexis				\$ -
Westlaw				\$ -
Meal Expenses				\$ -
Overtime				\$ -
Other Expenses				\$ -
				\$ -
<b>TOTAL</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>

Holme Roberts &amp; Owen LLP

October 30, 2002

W.R. Grace

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**Regarding: Libby - Access Case****Itemized Services**

Date	Tkpr	Description	Hours	Value
09/20/02	KWL	Review final Health Care Plan Agreement (.60); telephone call to Bob Emmett re final changes to Health Care Plan Agreement (.40).	1.00 \$	350.00
<b>Total Fees Through September 30, 2002:</b>			<b>1.00 \$</b>	<b>350.00</b>

**Timekeeper Rate Summary**

Initials	Name	Rank	Rate	Hours	Value
KWL	Kenneth W Lund	Partner	\$ 350.00	1.00 \$	350.00
<b>Total Fees:</b>				<b>1.00 \$</b>	<b>350.00</b>

**Accounts Receivable Detail**

Invoice	Date	Description	Amount
577905	10/31/01	Bill	31,638.92
		<i>Outstanding Balance on Invoice 577905:</i>	<i>\$ 31,638.92</i>
579873	11/20/01	Bill	4,639.70
	01/24/02	Cash Receipt	-3,715.66
		<i>Outstanding Balance on Invoice 579873:</i>	<i>\$ 924.04</i>
583055	12/27/01	Bill	1,428.00

## Defense of Cost Recovery Action - 00302

Name	Position	Hourly Rate	TOTAL HOURS BILLED			
			July	August	September	Total Comp.
Brown, Linnea	Partner	\$ 400.00	0	35.2	157	\$ 76,880.00
Harris, Colin	Partner	\$ 350.00	0	0	89.5	\$ 31,325.00
Lund, Kenneth	Partner	\$ 350.00	67.1	139.8	92.8	\$ 104,895.00
Schuh-Decker, Lisa	Partner	\$ 300.00	31.5	84.1	28.7	\$ 43,290.00
McCarthy, Jay D.	Partner	\$ 300.00	114.3	121.1	122.3	\$ 107,310.00
Neitzel, Charlotte	Partner	\$ 300.00	0	127.2	172.9	\$ 90,030.00
Weakley, Mark	Special Counsel	\$ 295.00	0	63.6	19.1	\$ 24,396.50
Baarlaer, Dennis	Special Counsel	\$ 275.00	0	0	23.8	\$ 6,545.00
Coggon, Katheryn	Special Counsel	\$ 275.00	132	185.8	205.5	\$ 143,907.50
Stevenson, Edward	Senior Counsel	\$ 280.00	149.6	219.2	177.7	\$ 153,020.00
Braegger, Troy	Senior Counsel	\$ 300.00	0	2.4	29.4	\$ 9,540.00
D'Alessandro, Jennifer	Senior Counsel	\$ 260.00	0	45	44.7	\$ 23,322.00
Cooley, Caroline	Contract Attorney	\$ 260.00	0	76.6	79	\$ 40,456.00
Galligan, Kevin	Sr. Associate	\$ 295.00	0	26.1	0	\$ 7,699.50
Young, Spencer	Associate	\$ 250.00	0	38.2	9.8	\$ 12,000.00
Tracy, Brent	Associate	\$ 240.00	0	6	0	\$ 1,440.00
Collins, Sven	Associate	\$ 235.00	0	11.6	0	\$ 2,726.00
Cohen, Louie	Associate	\$ 225.00	0	12.8	24	\$ 8,280.00
Maurelli, Gino	Associate	\$ 225.00	13.5	12.9	21.3	\$ 10,732.50
Rogers, Constance	Associate	\$ 225.00	0	24.7	6.1	\$ 6,930.00
Tognetti, Michael	Associate	\$ 225.00	0	9.1	0	\$ 2,047.50
Beasley, James	Associate	\$ 175.00	17.6	0.5	0	\$ 3,167.50
Faix, Josie	Associate	\$ 175.00	0	2.6	0	\$ 455.00
Sanchez, Corey	Associate	\$ 175.00	0	11	0	\$ 1,925.00
Barry, Geoffrey	Associate	\$ 220.00	51.9	39.9	50.6	\$ 31,328.00
Jacobsen, Brad	Associate	\$ 220.00	0	20.6	0	\$ 4,532.00
Trammell, Keith	Associate	\$ 185.00	3.1	34.6	110	\$ 27,324.50
Wall, Douglas	Associate	\$ 185.00	9.3	39.3	21.6	\$ 12,987.00
Ochs, Matthew	Associate	\$ 180.00	0	21.3	23.9	\$ 8,136.00
Crist, Allison	Associate	\$ 175.00	0	0	78	\$ 13,650.00
Hall, Jennifer	Associate	\$ 220.00	29.4	48.8	81.8	\$ 35,200.00
Messer, Joli	Associate	\$ 235.00	0	5.1	0	\$ 1,198.50
Higuera, Michael	Associate	\$ 175.00	0	10.4	20.6	\$ 5,425.00
Carroll, Ann	Paralegal	\$ 125.00	0	31.6	115.6	\$ 18,400.00
Sherman, Joan	Paralegal	\$ 125.00	111.9	58.2	168.1	\$ 42,275.00
Kinnear, Karen	Paralegal	\$ 125.00	17.5	53.4	28	\$ 12,362.50
Latuda, Carla	Paralegal	\$ 125.00	2.7	55.1	8.5	\$ 8,287.50
Jacobson, Joan	Paralegal	\$ 120.00	0	5.5	0	\$ 660.00
Stacey, Paula	Paralegal	\$ 125.00	1.4	17.4	2	\$ 2,600.00
Haag, Susan	Paralegal	\$ 105.00	0	0.3	16.4	\$ 1,753.50
Davidson, Dyan	Paralegal	\$ 110.00	0	13.4	28	\$ 4,554.00
Aberle, Natalie	Paralegal	\$ 110.00	51.8	114.8	126.7	\$ 32,263.00
Street, Lorraine	Paralegal	\$ 85.00	1	0	0	\$ 85.00
Herceglic, Angela	Paralegal	\$ 100.00	0	0	8	\$ 800.00
Brookshier, Casey	Paralegal	\$ 60.00	0	34.8	0	\$ 2,088.00
Cheeks, Stephanie	Paralegal	\$ 60.00	0	64.9	71.5	\$ 8,184.00
Duffus, Deborah	Paralegal	\$ 60.00	0	65.3	64.6	\$ 7,794.00
Layton, Katherine	Paralegal	\$ 60.00	0	67.6	26.1	\$ 5,622.00
Martel, Lisa	Paralegal	\$ 60.00	0	69.4	54	\$ 7,404.00
Patuto, Mary-Jill	Paralegal	\$ 60.00	0	72.8	3.7	\$ 4,590.00
Giunta Merz, Trista	Paralegal	\$ 60.00	0	81	75.5	\$ 9,390.00
Reed, Nathaniel	Paralegal	\$ 60.00	0	89	71.1	\$ 9,606.00
Simpson, Lorrie	Paralegal	\$ 60.00	0	74.8	80.95	\$ 9,345.00
Gomez, Kristi	Paralegal	\$ 60.00	0	58.2	0	\$ 3,492.00
Howard, Jennifer	Law Clerk	\$ 140.00	0.8	0	0	\$ 112.00
Mulholland, Imelda	Info. Specialist	\$ 110.00	94.5	33.5	84.5	\$ 23,375.00
Floyd, Mary Beth	Info. Specialist	\$ 90.00	101.7	83	40.5	\$ 20,268.00
Chrstnacht, Kathryn	Library	\$ 125.00	0.1	0	0	\$ 12.50
Sperberg, Bruce	Library	\$ 70.00	0.4	0	0	\$ 28.00
<b>TOTAL</b>			<b>1003.1</b>	<b>2619.5</b>	<b>2763.85</b>	<b>\$ 1,287,452.00</b>

**Defense of Cost Recovery Action - 00302**

<b>Description</b>	<b>July</b>	<b>August</b>	<b>September</b>	<b>Total</b>
Parking	\$ -	\$ 71.00	\$ 265.00	\$ 336.00
Photocopies	\$ 1,772.10	\$ 6,205.55	\$ 8,921.55	\$ 16,899.20
Facsimilies	\$ 100.00	\$ 447.00	\$ 379.00	\$ 926.00
Long Distance Telephone	\$ 122.73	\$ 545.61	\$ 323.33	\$ 991.67
Outside Courier	\$ 317.43	\$ 2,626.22	\$ 1,584.07	\$ 4,527.72
Travel Expenses	\$ 4,136.14	\$ 10,227.99	\$ 14,165.78	\$ 28,529.91
Lexis	\$ 2,947.71	\$ 1,076.91	\$ 4,412.28	\$ 8,436.90
Westlaw	\$ -	\$ -	\$ 263.84	\$ 263.84
Meal Expenses	\$ 873.10	\$ 704.49	\$ 909.41	\$ 2,487.00
Other Expenses/Temp. Staffing	\$ -	\$ 12,153.73	\$ 4,852.44	\$ 17,006.17
Research Services	\$ -	\$ -	\$ 49.30	\$ 49.30
Color copies	\$ 6.50	\$ 363.35	\$ 237.90	\$ 607.75
Oversize/Map Charge	\$ -	\$ 28.00	\$ 3.00	\$ 31.00
Tab Stock	\$ 0.05	\$ 1.30	\$ 2.60	\$ 3.95
Velo Binding	\$ 1.00	\$ 12.00	\$ 5.00	\$ 18.00
Overtime	\$ -	\$ 1,158.75	\$ 4,086.25	\$ 5,245.00
				\$ -
<b>TOTAL</b>	<b>\$ 10,276.76</b>	<b>\$ 35,621.90</b>	<b>\$ 40,460.75</b>	<b>\$ 86,359.41</b>

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**Regarding: Libby - Cost Recovery Case****Itemized Services**

Date	Tkpr	Description	Hours	Value
06/27/02	KJC	Team meeting re progress on various projects (1.00); conferences with JDMcCarthy re agenda for team meeting (0.10); telephone conferences with KWLund and R. Emmett re budget (0.60); conference with cost accountants re progress (2.30); review and revise potential witness list (0.30); manage case projects (0.40).	4.70	\$ 1,292.50
06/28/02	KWL	Prepare for trial team strategy meeting with client.	3.00	1,050.00
06/28/02	KJC	Telephone conference with KWLund re budget, document review plan, and other case projects (0.20); draft budget (0.90); telephone conference with data expert re progress (0.50); conferences with JDMcCarthy re expectations of data expert and progress (0.30); manage various case projects including prepare for client and expert meeting (2.60).	4.50	1,237.50
06/29/02	KWL	Prepare for trial team strategy meeting with client.	6.00	2,100.00
07/01/02	KWL	Prepare for meeting with clients and experts re case status and strategy (5.00); conduct portion of meeting with client and experts re case status and strategy (5.00).	10.00	3,500.00
07/01/02	JDM	Review GMBarry memo re legal standards (0.8); meet with EESTevenson re cost experts and strategy (0.8); prepare for meeting with cost experts (0.3); meet with cost experts (0.7); meet with KWLund and KJCoggon re meeting with client (0.9); outline risk expert issues (0.8); meet with CLNeitzel re pulmonologist (0.2); telephone conference with pulmonologist (0.6); attend portion of meeting with client and cost experts (4.4).	9.50	2,850.00

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**Itemized Services**

Date	Tkpr	Description	Hours	Value
07/01/02	KJC	Meeting with D. Siegel, W. Corcoran, R. Emmett, R. Finke, various experts and team re progress and strategies (7.70); conference with KWLund and JDMcCarthy re preparation for strategy meeting (0.60).	8.30	2,282.50
07/01/02	EES	Prepare for case strategy meeting (3.60); attend portion of case strategy meeting with Grace attorneys and various experts (4.90); review additional financial documentation (1.90).	10.40	2,912.00
07/01/02	GMB	Review and code documents related to EPA information requests and consumer product case issues.	9.70	2,134.00
07/01/02	MBF	Complete memo and chart for CLNeitzel regarding emergency removal actions.	0.80	72.00
07/01/02	ICM	Follow up on EPA Information Quality Guidelines (.80); read, review and summarize for meeting with client (.80).	1.60	176.00
07/02/02	KWL	Prepare for meeting with clients and experts re case status and strategy (2.90); conduct meeting with client and experts re case status and strategy (7.10).	10.00	3,500.00
07/02/02	JDM	Meet with client and experts (6.2); meet with cost expert (0.3); review ATSDR data (1.3); conference with EEStevenson re cost expert issues (0.3).	8.10	2,430.00
07/02/02	LSD	Follow up re Michael Hutchinson visit including search of database for additional documents, reviewing notes and begin review of discovery for relevant requests.	0.30	90.00
07/02/02	KJC	Meeting with D. Siegel, W. Corcoran, R. Emmett, R. Finke, various experts and team re progress and strategies (7.10); prepare for training session re document review project including staffing issues (0.80); conference with JDMcCarthy re depositions (0.60).	8.50	2,337.50



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**Itemized Services**

Date	Tkpr	Description	Hours	Value
07/02/02	EES	Review draft EPA guidelines re satisfying the Office of Management and Budget's data quality and integrity standards (2.20); begin review of Volume I of Wiley Wright's (EPA accounting expert) deposition testimony in another cost recovery case (3.60); attend portions of case strategy meeting with cost experts (1.30); strategy meeting with JDMcCarthy (.40).	7.50	2,100.00
07/02/02	JAH	Telephone conference with KATrammell re document review (.30); telephone conference with KJCoggon re same (.20).	0.50	110.00
07/03/02	JDM	Review notes from expert meetings (0.4); document review and coding training (2.8); review, categorize and code documents produced by EPA for relevance to various case issues (0.5); review EPA draft information quality guidelines (0.9).	4.60	1,380.00
07/03/02	LSD	Continue review of notes from Michael Hutchinson visit and begin summary of meeting highlights (1.8); research re alter ego and successor liability issues pertinent to imminent motions for summary judgment (.3).	2.10	630.00
07/03/02	KJC	Telephone conference with NCP expert re various issues (0.50); manage discovery issues (0.60).	1.10	302.50
07/03/02	EES	Complete review of Volume I of Wiley Wright's (cost expert) deposition testimony (1.30); review Volume II of Mr. Wright's deposition testimony re EPA cost recovery issues (2.90); conference calls with accounting experts re indirect cost documentation issues (1.60); review supplemental EPA cost package information (1.10).	6.90	1,932.00
07/03/02	MBF	Research (3.5) and draft (2.0) chart regarding time-critical removal actions for CLNeitzel.	5.50	495.00
07/05/02	EES	Complete review of Volume II of Wiley Wright's (EPA cost expert) deposition testimony.	2.20	616.00

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**Itemized Services**

Date	Tkpr	Description	Hours	Value
07/08/02	KWL	Review Julie Yang deposition transcripts (3.0); review Yang documents in preparation for defending deposition (2.0).	5.00	1,750.00
07/08/02	JDM	Review and comment on draft letter re outstanding discovery (0.2); review attachments to M. Cohn June 4, 2002 letter (5.6); telephone conference with CLNeitzel re ATSDR documents (0.1); conference call with KWLund and KJCoggon re deposition scheduling (0.9); telephone conference with CLNeitzel re depositions (0.2); review Whitehouse deposition excerpt (0.6).	7.60	2,280.00
07/08/02	KJC	Manage case projects including EPA review and respond to messages re document review (0.50); telephone conference with KWLund and JDMcCarthy re depositions (0.90).	1.40	385.00
07/08/02	EES	Review Volume III of Wiley Wright's deposition testimony in another EPA cost recovery case (3.50); conference calls with accounting experts re ATSDR indirect cost methodology issues (.70); begin review of Volume IV of Wiley Wright's deposition testimony (2.40); review case authority re allowable scope of key "expert" opinion testimony (1.10).	7.70	2,156.00
07/08/02	JLS	Respond to questions from document coders (2.30); telephone conferences with CCotts and MThompson re EPA Production Database issues (.90); telephone conferences with GMaurelli re document coding (.60); QC JGBeasley document coding (.50).	4.30	537.50
07/08/02	MBF	Arrange to get count of how many pages are in Supplement # 2 to the Libby Administrative Record for inclusion in letter to EPA asking for extension for comments (.30); review supplement # 2 to discover which images missing or documents were not scanned (2.0); 3 telephone conversations with EPA to arrange to obtain missing images and unscanned material for CLNeitzel review of supplement # 2 (.50).	2.80	252.00

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**Itemized Services**

Date	Tkpr	Description	Hours	Value
07/09/02	JDM	Telephone conference with CLNeitzel and JLSherman re data base issues (0.2); draft letter to EPA re discovery shortcomings (0.8); conference with GMBarry re EPA depositions (0.3); conference with EEStevenson re cost expert issues and expert depositions (0.4); review deponent document printout (0.3); conference with JLSherman re data base and deposition preparation (0.4); revise letter re ATSDR documents (0.4); review attachments to EPA response to administrative record comments (3.2).	6.00	1,800.00
07/09/02	KJC	Manage case projects including review and respond to messages re EPA document production, depositions and document review (0.70).	0.70	192.50
07/09/02	EES	Expand Marcor deposition outline (3.90); review key Marcor invoices/cost documentation (1.30); attend strategy meeting with JDMcCarthy (.40); conference calls with accounting experts re cost deposition issues (.60); strategy meeting with CLNeitzel re expert issues (.30); begin review of the deposition testimony of Charles Young (EPA indirect cost expert) (3.20).	9.70	2,716.00
07/09/02	GMB	Conference with JDMcCarthy re Peronard deposition (.3); research re administrative record for documents related to Paul Peronard (5.3).	5.60	1,232.00
07/09/02	NKA	Locate and organize Whitehouse documents with JLSherman for deposition purposes per JDMcCarthy's request (.70).	0.70	77.00

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**Itemized Services**

Date	Tkpr	Description	Hours	Value
07/09/02	JLS	Respond to questions from document coders (3.60); telephone conferences with CCotts and MThompson re EPA Production Database issues (.70); telephone conferences with GMaurelli re document coding (.70); QC JGBasley document coding (.40); prepare tracking spreadsheet for document coders re changes in document configurations (.50); review, QC and code documents for cost recovery issues (2.70).	8.60	1,075.00
07/09/02	LCS	Search Graham files boxes for Whitehouse depositions	1.00	85.00
07/09/02	MBF	Telephone conferences with translators to get quote for translating French article for CLNeitzel (.30); call Roger Bradley re getting tapes and documents copied (.20); review supplement #2 to Administrative Record to discover which records were not scanned by EPA (.60); add to chart of records missing from Administrative Record supplement #2 (.70).	1.80	162.00
07/10/02	KWL	Work on Yang deposition preparation (3.0); work on Weis deposition preparation (3.0).	6.00	2,100.00
07/10/02	JDM	Telephone conference with CLNeitzel re pulmonologist (0.2); telephone conference with KJCoggon re discovery (0.2); review medical articles (0.4); finish review of attachments to EPA response (3.7).	4.50	1,350.00
07/10/02	KJC	Conference with KWLund re various case projects status and schedule (1.20); telephone conference with R. Finke and J. Yang re deposition (0.80); manage case projects including document review, depositions scheduling and database issues (3.10); telephone conference with M. Cohn re Yang deposition and follow up re same (1.10).	6.20	1,705.00

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**Itemized Services**

Date	Tkpr	Description	Hours	Value
07/10/02	EES	Complete review of Volume IV of Wiley Wright's deposition testimony (1.90); review Marcor documentation for use in upcoming cost depositions (2.30); draft vendor cost deposition questions (3.40).	7.60	2,128.00
07/10/02	GMB	Research re admin record for documents related to Paul Peronard and Amendments to Action Memo (7.1).	7.10	1,562.00
07/10/02	JGB	Review and translate article written in French on mortality in asbestos producing regions of Quebec to English (4.60); review, categorize and code documents produced by EPA for relevance to various case issues (1.20).	5.80	1,015.00
07/10/02	NKA	Prepare boxes for shipment to warehouse (2.00); Review and code documents in EPA Production and make corrections to previously coded documents (5.50).	7.50	825.00
07/10/02	JLS	Respond to questions from document coders (1.90); telephone conferences with CCotts and MThompson re EPA Production Database issues (.60); telephone conferences with GMaurelli re document coding (.70); telephone conferences with KJCoggon and JDMcCarthy re database and coding issues (1.00); review, QC and code documents for cost recovery issues (1.80); prepare Boulder documents for scanning and warehouse (2.30); telephone conference with CLNeitzel re EPA administrative record documents (.20).	8.50	1,062.50

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Date	Tkpr	Description	Hours	Value
07/10/02	MBF	Complete chart of documents missing from Administrative Record supplement # 2 (.50); call Kelcey Land at EPA to inform her that additional documents are missing from supplement # 2 (.10); call CLNeitzel to inform her that Kelcey Land said that EPA attorneys will respond to our request for documents missing from supplement # 2 (.10); meet with CLNeitzel regarding creation of historical exposure chronology (.30); review documents in all iterations of Administrative Record (5.5); create and add to historical exposure chronology (1.0).	7.50	675.00
07/10/02	ICM	Review, categorize and code documents produced by EPA for relevance to various case issues (6.00); follow up with EPA in New York re documents requested on the Asbestos Dump site (.60); procure Daubert Reporter copies as per EESTevenson's request (0.20).	6.80	748.00
07/11/02	JDM	Attend strategy meeting.	1.00	300.00
07/11/02	KJC	Conference with team re depositions (1.00); manage various case projects including document review, response to discovery, deposition schedules (3.30); telephone conference with G. Graham re depositions, status conference, and other matters (0.40); telephone conference with KWLund re status of various projects (0.50); telephone conference with J. Freeman re depositions (0.30); telephone conferences with M. Cohn re Yang deposition (0.30); telephone conference with EESTevenson re expert progress (0.20).	5.90	1,622.50
07/11/02	EES	Strategy meeting with KJCoggon, JDMcCarthy, GMBarry, JAHall, NKAberle, and JLSherman (1.00); extended conference call with accounting cost experts re response action documentation issues (1.20); review additional cost schedules prepared by accounting experts (1.80).	4.00	1,120.00
07/11/02	GMB	Attend team meeting (1.00).	1.00	220.00

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Date	Tkpr	Description	Hours	Value
07/11/02	JGB	Review and translate article written in French on mortality in asbestos producing regions of Quebec to English (3.20 ); Attend training session on working with Lotus Notes and re document review/coding issues (3.80 hours); review, categorize and code documents produced by EPA for relevance to various case issues (3.00 ).	6.20	1,085.00
07/11/02	JAH	Attend strategy meeting (1.0); conference with KJCoggon re Peronard deposition in fraudulent conveyance case (.5).	1.50	330.00
07/11/02	NKA	Attend meeting in re deposition schedule (1.00); draft transmittal letter for Eric Moeller deposition transcript (.40); review, categorize and code documents produced by EPA for relevance to various case issues (5.80).	7.20	792.00
07/11/02	JLS	Train JWingard for cost recovery coding (1.20); attend meeting re deposition preparation with KJCoggon, CLNeitzel, JDMcCarthy, EESTevenson, NABerle, JAHall and GMBarry (1.00); prepare letter to Eric Moeller transmitting deposition for review (.40); prepare chart to track depositions and exhibits (.60); review, QC and code documents for cost recovery issues (3.20); respond to questions from reviewers (.40).	6.80	850.00
07/11/02	MBF	Review administrative record documents (3.5); create historical exposure chronology (3.5).	7.00	630.00

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**Itemized Services**

Date	Tkpr	Description	Hours	Value
07/12/02	JDM	Telephone conference with KWLund re DOJ request for stipulations (0.3); telephone conference with CLNeitzel re ZAI issues (0.3); meet with KJCoggon re DOJ request for stipulations (0.5); telephone conference with CLNeitzel re DOJ request (0.1); review ZAI discovery and May 2002 action memo re ZAI issues (0.8); conference with CJCoggon re potential stipulation re ZAI (0.2); prepare for telephone conference with J. Freeman re expert and ZAI stipulation (0.2); telephone conference with CLNeitzel re expert stipulation (0.2); telephone conference with J. Freeman re expert and ZAI stipulation (0.7); telephone conference with KWLund re DOJ position (0.3); telephone conference with CLNeitzel re DOJ position and expert issues (0.5); telephone conference with R. Finke re DOJ stipulation proposal (0.4).	4.50	1,350.00
07/12/02	KJC	Telephone conference with cost experts re remaining tasks and budget (0.50); conference with EESTevenson re experts and depositions (0.30); conferences with JDMcCarthy re J. Freeman message on ZAI (0.70); manage case projects including document review issues, staffing, deposition preparation, data production (4.10); telephone conference with R. Finke re data production and ZAI (0.30).	5.90	1,622.50
07/12/02	EES	Strategy meeting with KJCoggon (.30); conference call with KJCoggon and accounting experts re deliverables and other issues (.50); prepare for Marcor cost deposition (2.40).	3.20	896.00
07/12/02	JGB	Review, categorize and code documents produced by EPA for relevance to various case issues (5.60 ).	5.60	980.00
07/12/02	NKA	Review and target documents at DOJ for responsiveness to cost recovery issues (3.00); review and code electronic documents in EPA Production database for responsiveness to cost recovery issues and category (3.40).	6.40	704.00



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Date	Tkpr	Description	Hours	Value
07/12/02	MCL	Conference with JLSherman regarding status of coding project (.20); review, categorize and code documents produced by EPA for relevance to various case issues (1.10).	1.30	162.50
07/12/02	JLS	Review, QC and code documents for cost recovery issues (4.40); respond to questions from reviewers (.90); telephone conferences with KJCoggon, Gibson Arnold & Associates and CCotts re hiring and training temp to code documents (1.20); telephone conferences with CCotts re database changes (.60).	7.10	887.50
07/12/02	MBF	Review administrative record documents for historical exposure chronology research (5.0); revise historical exposure chronology (1.2).	6.20	558.00
07/13/02	KWL	Review various EPA correspondence re depositions and data issues (1.0); review client correspondence on case status and strategy (1.20); respond to various discovery and strategy issues (.80).	3.00	1,050.00
07/14/02	JAH	Review and prepare deposition outline for P. Peronard.	2.50	550.00
07/15/02	JDM	Review Administrative Record documents and prepare outline for ATSDR and ATSDR contractor depositions.	4.60	1,380.00
07/15/02	KJC	Conference with cost experts re deposition questions (1.50); telephone conference with JDMcCarthy re stipulation on attic insulation costs and draft e-mail re same (0.40); telephone conference with KWLund re status, stipulation, and Yang deposition (0.30); manage case projects including document review, deposition prep and schedules (2.80); telephone conference with R. Finke and D. Kuchinsky re Whitehouse deposition and follow up re same (1.70).	6.70	1,842.50
07/15/02	EES	Meeting with accounting experts re cost deposition issues (2.50).	2.50	700.00

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Date	Tkpr	Description	Hours	Value
07/15/02	JAH	Review and prepare deposition outline for P. Peronard.	8.30	1,826.00
07/15/02	MCL	Review and code electronic documents produced by EPA for responsiveness to Cost Recovery issues.	1.40	175.00
07/15/02	JLS	Review, categorize and code documents produced by EPA for relevance to various case issues (2.10); conferences with LStreet re status of scanning boxes (.60); prepare for Whitehouse deposition (1.90); respond to questions from document coders (.90).	5.50	687.50
07/15/02	MBF	Review supplement 2 to Administrative Record for information for historical exposure chronology (4.5); revise and add to historical exposure chronology document (.50).	5.00	450.00
07/15/02	ICM	Conduct case law research on non Grace related asbestosis litigation as per CLNeitzel's request (4.00); search for historical studies on health related asbestos problems in industry (4.00).	8.00	880.00
07/16/02	JDM	Prepare for ATSDR and ATSDR contactor depositions including document review and deposition outlines (5.8); telephone conference with CLNeitzel regarding expert reports and proposed stipulation (0.3).	6.10	1,830.00
07/16/02	KJC	Conference with EESTevenson re Marcor deposition questions (0.60); manage document review and other case projects including address deposition scheduling and document production (3.4); telephone conference with H. Kukis re document production (0.20); conference with KWLund re depositions and trial issues (0.30); travel to Libby, MT (3.00) (3.00 N/C) (NWT 50%); review deposition questions (1.20); conferences with client and expert re site (2.10).	10.80	2,970.00
07/16/02	EES	Meeting with accounting experts re Marcor cost document issues (1.60); revise Marcor 30(b)(6) deposition outline (1.20).	2.80	784.00

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Date	Tkpr	Description	Hours	Value
07/16/02	JAH	Review and prepare deposition outline for P. Peronard (8.4); conference with KJCoggon re same (.5).	8.90	1,958.00
07/16/02	NKA	Conference with temporary paralegal re Document Director and Lotus Notes to begin coding in EPA Production database (1.10); review, categorize and code documents produced by EPA for relevance to various case issues (6.10); begin searching for and locating documents for Yang deposition preparation per KJCoggon's request (1.70).	8.90	979.00
07/16/02	KLK	Locate documents for CGHarris from Grace EPA Production database (2.5).	2.50	312.50
07/16/02	JLS	Review, categorize and code documents produced by EPA for relevance to various case issues (2.20); respond to questions from coders (.70); conferences with LStreet re status of scanning boxes (.60); train SHaraldson (temporary employee) re coding EPA production documents (3.20); conferences with CCotts and CGraham re database entry of CLNeitzel comments (.80).	7.50	937.50
07/16/02	MBF	Review Administrative Record Supp. # 2 for historical exposure chronology (4.5); revise and edit to historical exposure chronology chart (.50).	5.00	450.00
07/16/02	ICM	Conduct case law research on non Grace related asbestosis litigation as per CLNeitzel's request (4.60); conduct research relating to experts analysis as per EESTevenson's request (1.30).	5.90	649.00
07/17/02	JDM	Review, categorize and code documents produced by EPA for relevance to various case issues (2.6); preparation for ATSDR and consultant depositions, including preparation of outlines, selection and preparation of deposition exhibits (5.4)	8.00	2,400.00

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Date	Tkpr	Description	Hours	Value
07/17/02	KJC	Conference with expert re schedule and fact gathering (0.30); site tour and conferences with experts and client (10.0); telephone conference with W. Sparks re depositions (0.40); conference with G. Graham re depositions (0.20); review letter re deposition notice for Marcor (0.30).	11.20	3,080.00
07/17/02	EES	Revise and expand Marcor deposition outline (2.30); revise and finalize Marcor Rule 30(b)(6) cost deposition outline (1.40).	3.70	1,036.00
07/17/02	JAH	Review and prepare deposition outline for P. Peronard (7.5); conference with EEStevenson re same (.2).	7.70	1,694.00
07/17/02	NKA	Locate and prepare Julie Yang documents and indices for deposition prep per KJCoggon's request (4.10); review, categorize and code documents produced by EPA for relevance to various case issues (3.40).	7.50	825.00
07/17/02	KLK	Confer with JLSherman re coding of documents (0.2); review and code EPA production documents (5.3).	5.50	687.50
07/17/02	JLS	Conferences with NKABerle re confidentiality agreement for SHaraldson and prepare same (.50); review, categorize and code documents produced by EPA for relevance to various case issues (2.90); prepare for Whitehouse deposition (3.40).	6.80	850.00
07/17/02	ICM	Conduct case law research on non Grace related asbestosis litigation and 1940's health surveys as per CLNeitzel's request (5.10); conduct research to develop deposition outline as per EEStevenson's request (1.90).	7.00	770.00

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Date	Tkpr	Description	Hours	Value
07/18/02	JDM	Review articles regarding medical issues (0.7); conference with JLSherman regarding Whitehouse documents (0.3); telephone conference with CLNeitzel regarding mesothelioma cases (0.7); review ATSDR documents regarding Middleton (0.3); review EPA's mesothelioma report and related documents (0.3); review mesothelioma depositions (1.2); conference with CLNeitzel regarding additional mesothelioma issues (1.1); telephone conference with J. Freeman regarding stipulation (0.6).	5.20	1,560.00
07/18/02	LSD	Review of Michael Hutchinson interview.	0.50	150.00
07/18/02	KJC	Travel from Libby, MT (2.00) (2.00 N/C) (NWT 50%); attend portion of Grace team meeting (.20); review Wilkins and Skramstad depositions (1.60); review and revise Marcor deposition outline (0.80); manage various case projects including document review, deposition scheduling, document production from EPA and deposition preparation (2.10); investigate trial IT Department support options (0.20); telephone conference with E. Moeller re deposition, documents and other issues (0.30); telephone conference with J. Freeman re deposition schedule (0.30).	7.40	2,035.00
07/18/02	EES	Meeting with trial team re case strategy (.70); conference calls with accounting experts re Marcor documentation issues (.80); conference calls with cost expert re Marcor deposition issues (.60); prepare for Marcor project manager deposition (3.70).	5.80	1,624.00
07/18/02	NKA	Read and review EPA Action Memoranda and related EPA correspondences (3.40); locate Yang documents per KWLund for deposition preparation (1.30); Review and code electronic documents in EPA Production database for responsiveness to cost recovery issues, category, and attorney comments (4.3); Search for documents in re air sampling per KJCoggon's request in EPA Historical database (1.30).	10.30	1,133.00

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Date	Tkpr	Description	Hours	Value
07/18/02	KLK	Review and code EPA production documents (5.0).	5.00	625.00
07/18/02	JLS	Conferences with NKAberle re Yang deposition preparation for same (2.10); preparation for Whitehouse deposition (2.30); train SBYoung re review, categorize and code documents produced by EPA for relevance to various case issues (.80).	5.20	650.00
07/18/02	MBF	Review administrative record for historical exposure chronology (1.5); revise and edit to historical exposure chronology chart (.50).	2.00	180.00
07/18/02	ICM	Review and summarize case law on non Grace related asbestosis litigation (4.00) and 1940's health surveys as per CLNeitzel's request (4.00); procure studies from sources in and out of state (2.00).	10.00	1,100.00
07/19/02	JDM	Conference with CLNeitzel regarding expert issues (0.4); telephone conference with R. Finke regarding stipulation (0.6); telephone conference with KJCoggon regarding depositions (0.2); additional telephone conference with R. Finke regarding stipulation (0.8).	2.00	600.00
07/19/02	KJC	Manage various case projects including document scanning and coding, deposition scheduling and preparation, database and trial preparation issues (1.80); telephone conference with KWLund re status of case projects (0.50).	2.30	632.50
07/19/02	EES	Prepare for Marcor cost deposition (2.90); review and select key Marcor documents as exhibits for Marcor deposition (3.80); conference calls with accounting experts re Marcor deposition issues (.50).	7.20	2,016.00
07/19/02	NKA	Review Libby #2 Production documents at DOJ for responsiveness to cost recovery issues (2.80); Teleconference and email to JLSherman re production of documents for Dr. Yang deposition per KWLund's request (.50).	3.30	363.00

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Date	Tkpr	Description	Hours	Value
07/19/02	KLK	Review and code EPA production documents (4.5).	4.50	562.50
07/19/02	JLS	Review, categorize and code documents produced by EPA for relevance to various case issues (2.40); prepare for Yang deposition (5.20); prepare for Whitehouse deposition (.90).	8.50	1,062.50
07/19/02	MBF	Review administrative record for historical exposure information (2.7); revise historical exposure chart (.50).	3.20	288.00
07/19/02	ICM	Conduct case law and review and summarize research results on non Grace related asbestosis litigation (6.60) and 1940's health surveys as per CLNeitzel's request (3.40); procure out of state studies (2.00).	12.00	1,320.00
07/20/02	EES	Review and expand draft of CDM deposition outline (2.80).	2.80	784.00
07/21/02	JDM	Conference with CLNeitzel regarding medical experts.	0.80	240.00
07/21/02	MBF	Research for CLNeitzel regarding Clean Air Act statute and regulations and definition of asbestos.	2.00	180.00
07/22/02	JDM	Meet with EES Stevenson re expert deposition issues (0.6); review draft expert reports (2.2); conference with KJCoggon re depositions (0.6); telephone conference with experts re reports (1.0).	4.40	1,320.00
07/22/02	KJC	Review and respond to e-mail and questions re document review and coding (1.10); coordinate deposition schedule and strategies (1.10); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (1.20); address inquiries and issues re document databases (1.20); conference with JDMcCarthy re depositions (0.60); telephone conference with R. Finke re depositions (0.30); telephone conference with experts re other sites (0.40); conference with EES Stevenson re deposition outline for Marcor (0.30); draft e-mail to E. Moeller re audit document (0.50).	6.70	1,842.50

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Date	Tkpr	Description	Hours	Value
07/22/02	EES	Review documents produced in DOJ's July 18, 2002 cost package supplement (2.40); conference call with accounting expert re CDM and KUO Environmental deposition issues (.80); conference calls with cost and technical experts re response issues (.40); meeting with KJCoggon re Marcor deposition issues (.30); conference calls with cost expert re Marcor deposition issues (.80); conference call with John Moscato (DOJ) re cost deposition issues (.80); review KUO cost documents and revise planned deposition exhibits (1.90); prepare for KUO Environmental cost deposition (1.40).	8.80	2,464.00
07/22/02	GMB	Lexis and CFR research on statutory definition of asbestos (3.7); Lexis research on caselaw concerning definition of asbestos (3.5).	7.20	1,584.00
07/22/02	JLS	Prepare for Yang deposition (1.30); telephone conferences with CCotts re EPA production database revisions (1.90); train PRStacey re document coding (2.10).	5.30	662.50
07/22/02	MBF	Review administrative record for historical exposure chronology (7.0); revise historical exposure chronology chart (1.30)..	8.30	747.00
07/22/02	ICM	Search for complete studies which were partially supplied as part of EPA production as per CLNeitzel's request (3.00).	3.00	330.00
07/22/02	BS	Conference with MBFloyd re need for copy of 1992 Federal Register entry (.20); telephone conferences with Access/Information re obtaining same (.20).	0.40	28.00
07/23/02	KWL	Meeting with CLNeitzel and KJCoggon re case status and strategy (.50); meeting with KJCoggon re various strategic issues (.50); work on Yang deposition preparation (2.40); review expert report documents (2.0)	5.40	1,890.00
07/23/02	LSD	Review Hutchinson notes in preparation for compiling information to help with fact depositions.	1.00	300.00



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Date	Tkpr	Description	Hours	Value
07/23/02	KJC	Address billing issues from vendors and experts (0.50); conference with KWLund re status of case projects, schedule and priorities (1.00); telephone conference with G. Graham re expert reports, P. Peronard deposition and Grace story (0.40); telephone conference with G. Graham and W. Sparks re potential Grace witnesses (0.50); telephone conference with J. Freeman re depositions and Audit documents (0.30); telephone conference with E. Moeller re Audit document and ASTM meeting (0.40); conferences with JLSherman and IT Department re database issues (0.40); review and respond to e-mail and inquiries re document scanning and coding (0.30); e-mail R. Emmett re deposition costs (0.20); conferences with HRO team and DOJ attorneys re deposition scheduling (0.30).	4.30	1,182.50
07/23/02	EES	Revise Marcor deposition outline (1.30); review CDM documentation and select initial CDM deposition exhibits (2.00); review ATSDR indirect cost documentation (1.40); telephone conferences with John Moscato (DOJ attorney) re cost deposition scheduling issues (.70); conference calls with accounting experts re CDM deposition issues (.90); review and finalize Marcor deposition exhibits (1.60).	7.90	2,212.00
07/23/02	GMB	Review of admin record for USG definitions of asbestos (2.1); draft memo re various definitions of asbestos (4.1).	6.20	1,364.00
07/23/02	JLS	Review, categorize and code documents produced by EPA for relevance to various case issues (4.70); telephone conferences with CCotts and DHengemuhle re EPA production database issues and revisions (1.90); conferences with Steve Haraldson re assignments (.30).	6.90	862.50
07/23/02	MBF	Review administrative record for historical exposure chronology (9.0); revise historical exposure chronology chart (1.90).	10.90	981.00

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Date	Tkpr	Description	Hours	Value
07/23/02	ICM	Search for complete documents that have been partially supplied in EPA production as per CLNeitzel's request (2.50); conduct research for EEStevenson re technical aspects of deposition outline (3.50).	5.60	616.00
07/24/02	KWL	Review draft reports from various experts (3.50); provide comments to CLNeitzel (.70); review DOJ stipulation re ZAI costs (.30).	4.50	1,575.00
07/24/02	JDM	Exchange voice mails re depositions (0.1); telephone conference with EEStevenson re depositions (0.2); review stipulation re ZAI (0.6); conference with CLNeitzel re ZAI stipulation and expert reports (0.4); review draft reports (4.3); telephone conference with Jim Freeman re draft stipulation (0.3); telephone conference with D. Askman (DOJ) re ATSDR depositions (0.2); telephone conference with EEStevenson re expert issues (0.1); telephone conference with CLNeitzel re expert reports (0.3).	6.50	1,950.00
07/24/02	LSD	Review notes and materials received from Michael Hutchinson and compile pertinent information for meeting with EEStevenson (3.40); meet with EEStevenson re pertinent information for his fact witness depositions of Marcor (1.10); office conference with KWLund and EEStevenson re further followup on Michael Hutchinson (.20); draft summary of information received from and opinions of Michael Hutchinson (2.60).	7.30	2,190.00

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Date	Tkpr	Description	Hours	Value
07/24/02	KJC	Review and respond to e-mail and messages re deposition schedule (1.40); telephone conference with W. Sparks re potential witnesses (0.40); review draft expert report (0.50); address inquiries and issues re document databases (0.20); address billing issues from vendors and experts (0.70); review and respond to e-mail and questions re document review and coding (0.80); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (1.10); review and respond to e-mail and follow up on document scanning and coding from EPA production (0.30); respond to questions from client and team re facts and documents (0.90).	6.30	1,732.50
07/24/02	EES	Review additional cost documents for possible use as deposition exhibits for the CDM and KUO depositions (2.80); meeting with accounting expert re ATSDR cost documentation (.60); meeting with LSDecker re CDM deposition issues (1.10); conference calls with John Moscato re numerous deposition scheduling issues (.80); conference calls with accounting experts re cost deposition issues and expert report matters (.90); prepare for Marcor deposition (2.90).	9.10	2,548.00
07/24/02	GMB	Additional internet-based research on geological definitions of asbestos (2.8); edit memo re definition of asbestos (3.5).	6.30	1,386.00
07/24/02	JLS	Database research re screening study, exposure study and "case series" for JDMcCarthy for upcoming depositions (4.60).	4.60	575.00
07/24/02	MBF	Search for 1985 Grace risk assessment re products for CLNeitzel (1.0); cite-check draft of comments to EPA regarding second supplement to Administrative Record (7.0).	8.00	720.00

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Date	Tkpr	Description	Hours	Value
07/24/02	ICM	Search for technical documentation and draft deposition questions re technical questions on sampling and analysis as per EESTevenson's request (3.60); assist CLNeitzel by procuring documents as per her request (1.60); go to CUHSC and procure studies for CLNeitzel and JDMcCarthy (2.50).	7.70	847.00
07/25/02	JDM	Review draft stipulations (0.3); review Whitehouse outline (0.5); review ATSDR outlines (0.4); team strategy meeting (1.0); draft e-mail to client re draft stipulation (0.3); review draft expert reports (5.0); telephone conference with J. Freeman and D. Peronard re draft stipulation (0.6); telephone conference with G. Graham re depositions (0.2).	8.30	2,490.00
07/25/02	LSD	Continue drafting and revising summary re meeting with Michael Hutchinson and opinions re EPA activities at the screening plant (3.00).	3.00	900.00
07/25/02	KJC	Telephone conference with R. Finke re attic insulation and expert reports (0.30); review draft expert reports (3.10); conferences and e-mail exchanges with counsel re expert reports (2.20).	5.60	1,540.00
07/25/02	EES	Meeting with trial team re case strategy issues (1.0); review draft reports/comments re administrative record issues (3.70); conference calls with John Moscato (DOJ) re cost deposition issues (.60); conference calls with Heidi Kukis (DOJ) re cost expert deposition issues (.50); conference calls with accounting experts re ATSDR cost deposition issues (.80); review EPA indirect cost methodology workpapers (1.80).	8.40	2,352.00
07/25/02	GMB	Additional document review of admin record file concerning Weis remarks on asbestos (1.3); coding EPA production database for use in cost recovery case (5.0).	6.30	1,386.00

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Date	Tkpr	Description	Hours	Value
07/25/02	MBF	Review administrative record documents for preparation of historical exposure chronology (5.0); revise and complete historical exposure chronology (1.5); search document databases to locate reference cited in CLNeitzel comments regarding administrative record supplement # 2 (.50).	7.00	630.00
07/25/02	ICM	Procure studies in house and at CUHSC as per CLNeitzel's request.	3.00	330.00
07/26/02	KWL	Review Anderson expert report.	2.00	700.00
07/26/02	KWL	Review RJLee expert report.	2.60	910.00
07/26/02	LSD	Continue with Michael Hutchinson review and summary, including drafting list of additional documents and information to recover (4.0).	4.00	1,200.00
07/26/02	KJC	Address inquiries and issues re document databases (0.20); coordinate deposition schedule and strategies (1.40); address billing issues from vendors and experts (0.90); review and respond to e-mail and questions re document review and coding (0.10); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.80); review and respond to e-mail and follow up on document scanning and coding from EPA production (0.20); respond to questions from client and team re facts and documents (0.20); telephone conference with W. Sparks and G. Graham re J. Wolter deposition (0.30); telephone conference with D. Siegel and others re Libby reserves (0.20); telephone conference with R. Emmett re billing issues, schedule, and depositions (0.30); telephone conference with A. Stringer re facts, deposition preparation, and travel plans (0.20); follow up with H. Kukis re DOJ response to ATSDR documentation (0.20); telephone conference with H. Kukis re outstanding discovery requests and deposition schedule (0.40); telephone conference with G. Graham re depositions, witnesses, expert reports and case strategy (0.40).	5.80	1,595.00

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Date	Tkpr	Description	Hours	Value
07/26/02	EES	Conference calls with accounting experts re indirect cost/overhead issues (1.30); prepare for CDM cost deposition (3.30); review additional EPA indirect cost documentation (2.60).	7.20	2,016.00
07/26/02	JLS	Review, categorize and code documents produced by EPA for relevance to various case issues (4.90); draft and edit deposition notices for Lybarger, CDM, Middleton and Dearwent (2.40); telephone conferences with KJCoggon and Matt Murphy re deposition schedule (.80).	8.10	1,012.50
07/26/02	MBF	Finish historical exposure chronology (.50); perform search in Lotus Notes database for Ask EPA article cited in administrative record response (.50).	1.00	90.00
07/26/02	ICM	Draft deposition questions re technical questions on sampling and analysis as per EESTevenson's request.	2.00	220.00
07/28/02	JLS	Telephone conferences with MWWeakley re database coding issues (.50); draft e-mails to KJCoggon, Richard Finke and Matt Murphy re deposition schedule (.40); review, categorize and code documents produced by EPA for relevance to various case issues (.30).	1.20	150.00
07/29/02	JDM	Exchange e-mails re deposition scheduling (0.3); review draft expert reports (0.3); review G. Graham's Whitehouse outline (2.4); telephone conference with G. Graham re ATSDR and Whitehouse deposition coordination (1.0); draft deposition outlines (1.3); Lotus/Document Director/Live Notes training (3.1); review research memo re asbestos (0.2); review draft expert report (0.8).	9.40	2,820.00
07/29/02	LSD	Draft and revise detailed memorandum summarizing documents received from Hutchinson, comparison to EPA documents and task list of to followup information based on the interview with Hutchinson (8.0)	8.00	2,400.00

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Date	Tkpr	Description	Hours	Value
07/29/02	KJC	Address inquiries and issues re document databases (0.10); coordinate deposition schedule and strategies (0.20); address billing issues from vendors and experts (0.10); coordinate expert work including review and respond to email and messages and telephone conferences with experts and counsel (0.20); review and respond to email and follow up on document scanning and coding from EPA production (0.10); address staffing for document review (0.50).	1.20	330.00
07/29/02	EES	Review Dale Jensen deposition testimony in another case re EPA cost documentation issues and indirect cost methodology (2.60); conference calls with accounting experts re expert report and deposition exhibit issues (1.30); prepare for Charles Young's indirect cost deposition (2.20).	6.10	1,708.00
07/29/02	GM	Review, categorize and code documents produced by EPA for relevance to various case issues.	7.50	1,687.50
07/29/02	DPW	Review, organize and code documents produced by EPA for relevance to various case issues.	8.30	1,535.50
07/29/02	JLS	Review, categorize and code documents produced by EPA for relevance to various case issues (2.80); draft and edit deposition notices for Lybarger, CDM, Middleton and Dearwent (1.20); draft deposition notice for William Hurley (EEC) (1.80); conference with PRStacey re deposition schedule (0.40); train JDMcCarthy re Lotus Notes and Document Director (2.20).	8.40	1,050.00
07/29/02	PRS	Review, categorize and code documents produced by EPA for relevance to various case issues (1.40).	1.40	175.00
07/29/02	MBF	Review, categorize and and code documents produced by EPA for relevance to various case issues (4.40).	4.40	396.00

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**Itemized Services**

Date	Tkpr	Description	Hours	Value
07/29/02	ICM	Draft deposition questions re technical questions on sampling and analysis as per EESTevenson's request (6.50); and procure studies from CUHSC as per CLNeitzel's request (1.30).	7.80	858.00
07/29/02	KAC	Research re articles by Sluis-Cremer, andd Bezuidenhout, and Weiss on Asbestosis for MBFloyd.	0.10	12.50
07/30/02	KWL	Review expert reports from RJLee and Elizabeth Anderson (4.20); conference with KJCoggon re status of various projects and strategies for completing same (.30).	4.50	1,575.00
07/30/02	JDM	Review ATSDR document indices (0.2); review draft expert reports (2.6); telephone conference with expert re draft report (0.2); conference with GMaurelli re ATSDR deposition documents (0.8); conference with DPWall re ATSDR deposition documents and preparation (0.9); conference with MBFloyd re ATSDR deposition documents and preparation (0.2); conference with KJCoggon re expert reports and depositions (0.4); prepare for ATSDR depositions (1.4); telephone conference with KJCoggon re expert depositions (0.2).	6.90	2,070.00
07/30/02	LSD	Continue finalizing Hutchinson memorandum re interview, including locating documents discussed and referred to.	3.50	1,050.00



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**Itemized Services**

Date	Tkpr	Description	Hours	Value
07/30/02	KJC	Coordinate deposition schedule and strategies (1.70); address billing issues from vendors and experts (0.20); review and respond to email and questions re document review and coding (0.50); coordinate expert work including review and respond to email and messages and telephone conferences with experts and counsel (0.70); review and respond to email and follow up on document scanning and coding from EPA production (0.30); respond to questions from client and team re facts and documents (0.40); conference with KWLund re status of various case projects and strategies for completing same (0.30); telephone conference with W. Sparks re witness interviews and depositions (0.30); telephone conference with G. Graham re depositions, witnesses, strategies and schedules (0.30); draft materials for witness interviews (0.80); draft 26(a)(2) expert disclosure and coordinate with CLNeitzel re production (2.20); telephone conference with H. Kukis re documents and privilege logs (0.80); draft emails to team re discussion with H. Kukis (0.70).	9.20	2,530.00
07/30/02	EES	Strategy meeting with JDMcCarthy re ATSDR deposition issues (.40); conference calls with John Moscato re 30(b)(6) deposition issues (.90); conference call with Mark Elmer (DOJ attorney) re ATSDR indirect cost deposition issues (.60); finalize CDM Rule 30(b)(6) deposition notice (1.10); conference calls with accounting experts re ATSDR deposition issues and deposition scheduling/attendance issues (.80); draft deposition outline for ATSDR depositions (3.30); review ATSDR guidelines re peer review and other standards for studies and technical data (1.70).	8.80	2,464.00
07/30/02	GMB	Code EPA production database for use in cost recovery case. (2.5)	2.50	550.00
07/30/02	DPW	Conference with JDMcCarthy re Middleton deposition (1.00).	1.00	185.00

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**Itemized Services**

Date	Tkpr	Description	Hours	Value
07/30/02	JLS	Review, categorize and code documents produced by EPA for relevance to various case issues (1.30); respond to questions from coders (1.10); train MWWeakley, CGHarris and JMHoward re Lotus Notes and Document Director and document coding (2.20); prepare deposition notices for KUO Environmental and William Hurley (1.60); telephone conferences with KJCoggon and David Codevilla re deposition arrangements (1.20).	7.40	925.00
07/30/02	JMH	Attend training session on working with Lotus Notes and re cost recovery coding issues.	0.80	112.00
07/30/02	MBF	Code cost recovery documents in Lotus Notes database (2.7); review and print out relevant documents from Lybarger documents in Lotus Notes database in preparation for deposition (4.0).	6.70	603.00
07/30/02	ICM	Follow up on interlibrary loan book for JDMcCarthy re deposition preparation; (0.10); finalize draft deposition questions for EEStevenson (2.40); review documents from EPA and determine if audio tapes/voice tapes have corresponding written summaries (2.30); search for ATSDR information standards guidance documents under GAO reporting requirements (1.20).	6.00	660.00
07/31/02	KWL	Review final expert reports including Hughson and Moolgavkar (3.0); telephone conference with Bill Corcoran re same (.20); begin review of EPA expert reports (1.60); telephone conference with Richard Finke re document preparation issues (.30).	5.10	1,785.00
07/31/02	JDM	Prepare for ATSDR depositions (4.9); review U.S. expert reports (1.0); conference with KWLund re case strategy (0.4).	6.30	1,890.00

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**Itemized Services**

Date	Tkpr	Description	Hours	Value
07/31/02	LSD	Conference with KJCoggon re location of various documents referred to in Hutchinson memorandum (.30); complete final revisions, attaching pertinent and relevant documents to Hutchinson memorandum (.30); conference with ICMulholland re locating additional information and documents (.10); begin review of outstanding discovery to determine disclosure obligations and whether Grace has requested certain documents from EPA (1.10).	1.80	540.00
07/31/02	KJC	Coordinate deposition schedule and strategies (0.50); address billing issues from vendors and experts (0.10); review and respond to email and questions re document review and coding and solicit assistance for same (1.40); coordinate expert work including review and respond to email and messages and telephone conferences with experts and counsel (0.50); review and respond to email and follow up on document scanning and coding from EPA production (0.20); respond to questions from client and team re facts and documents (0.80); work with experts and CLNeitzel to finalize and file reports (3.00); telephone conference with KWLund re strategy session and follow up re same (0.10); telephone conferences with J. Freeman and H. Kukis re documents and depositions (0.70).	7.30	2,007.50
07/31/02	EES	Draft NORC cost deposition outline (2.80); draft methodology (Daubert) type questions re ATSDR Libby studies (1.90); revise Marcor deposition outline (3.30); telephone conferences with accounting expert re deposition preparation and expert report issues (.80); telephone conferences with John Moscato re cost deposition scheduling issues (.30); finalize KUO Environmental and Charles Young deposition notices (.20).	9.30	2,604.00
07/31/02	GM	Review, categorize and code documents produced by EPA for relevance to various case issues.	6.00	1,350.00

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**Itemized Services**

Date	Tkpr	Description	Hours	Value
07/31/02	KAT	Review, categorize and code documents produced by EPA for relevance to various case issues (3.10).	3.10	573.50
07/31/02	JLS	Review emails re document coding (0.30); review EPA June 4 response to WR Grace's comments on administrative records supplement (0.90).	1.20	150.00
07/31/02	MBF	Review Jeffrey Lybarger documents in Lotus Notes database in preparation for deposition (5.0); print out important documents for Jeffrey Lybarger deposition for JDMcCarthy (1.60).	6.60	594.00
07/31/02	ICM	Draft deposition questions for ATSDR member depositions as per EEStevenson's request (3.60); search for Hutchinson referenced documents in production and locate all data pertaining to the screening plant testing as per LSDecker's request (4.50).	8.10	891.00

**Total Fees Through July 31, 2002: 1003.10 \$ 213,881.50**

**Timekeeper Rate Summary**

Initials	Name	Rank	Rate	Hours	Value
KWL	Kenneth W. Lund	Partner	\$ 350.00	67.10	\$ 23,485.00
LSD	Lisa Schuh-Decker	Partner	300.00	31.50	9,450.00
JDM	Jay D. McCarthy	Partner	300.00	114.30	34,290.00
KJC	Katheryn J. Coggon	Special Counsel	275.00	132.00	36,300.00
EES	Edward E. Stevenson	Senior Counsel	280.00	149.60	41,888.00
GM	Gino Maurelli	Associate	225.00	13.50	3,037.50
GMB	Geoffrey M. Barry	Associate	220.00	51.90	11,418.00
JAH	Jennifer A. Hall	Associate	220.00	29.40	6,468.00
KAT	Keith A. Trammell	Associate	185.00	3.10	573.50
DPW	Douglas P. Wall	Associate	185.00	9.30	1,720.50

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**Timekeeper Rate Summary**

Initials	Name	Rank	Rate	Hours	Value
JGB	James G. Beasley	Associate	175.00	17.60	3,080.00
KLK	Karen L. Kinnear	Paralegal	125.00	17.50	2,187.50
MCL	M Carla. Latuda	Paralegal	125.00	2.70	337.50
JLS	Joan L. Sherman	Paralegal	125.00	111.90	13,987.50
PRS	Paula R. Stacey	Paralegal	125.00	1.40	175.00
NKA	Natalie K. Aberle	Paralegal	110.00	51.80	5,698.00
JMH	Jennifer M. Howard	Law Clerk	140.00	0.80	112.00
LCS	Loraine C. Street	Other	85.00	1.00	85.00
ICM	Imelda Mulholland	Information Specialist	110.00	94.50	10,395.00
MBF	Mary Beth Floyd	Information Specialist	90.00	101.70	9,153.00
KAC	Katheryn A. Christnacht	Library	125.00	0.10	12.50
BS	Bruce Sperberg	Library	70.00	0.40	28.00
<b>Total Fees:</b>				<b>1,003.10</b>	<b>\$ 213,881.50</b>

**Itemized Disbursements**

Date	Qty	Description	Amount
05/09/02		Long Distance Telephone: ntner Servi : 154354000; DATE:	\$ 73.14
06/07/02		Lexis	139.73
06/13/02		Lexis	531.35
06/17/02		Lexis	322.73
06/20/02		Lexis	72.39
06/21/02		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-255-56617; DATE: 6/21/2002 - Courier, Acct. 0802-0410-8 06-12; Nick Cummings Chicago, IL	15.06

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Date	Qty	Description	Amount
06/21/02		Travel Expense: VENDOR: Warwick Hotel; INVOICE#: 33789; DATE: 6/21/2002 - Acct #00020, Room Charges, Gary Graham, 6/20/02	123.66
06/25/02		Lexis	321.72
06/25/02		Travel Expense: VENDOR: Majest International; INVOICE#: 18360; DATE: 6/25/2002 - Airfare, 7/16-7/18/02, Denver Spokane, Spokane Denver, K. Coggon	686.00
06/27/02		Lexis	82.44
06/27/02		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-255-96377; DATE: 6/27/2002 - Courier, Acct. 0802-0410-8 06-20; Richard Bartelt Chicago, IL	13.59
06/27/02		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-255-96377; DATE: 6/27/2002 - Courier, Acct. 0802-0410-8 06-21; Dr William G Hughson La Jolla, Ca	13.48
06/27/02		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-255-96377; DATE: 6/27/2002 - Courier, Acct. 0802-0410-8 06-21; Richard Bartelt Chicago, IL	12.13
06/27/02		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-255-96377; DATE: 6/27/2002 - Courier, Acct. 0802-0410-8 06-21; Elizabeth Anderson Alexandria, Va	13.46
06/27/02		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-255-96377; DATE: 6/27/2002 - Courier, Acct. 0802-0410-8 06-21; Dr Rich Lee Monroeville, Pa	13.06
06/27/02		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-255-96377; DATE: 6/27/2002 - Courier, Acct. 0802-0410-8 06-14; Nick Cummings Chicago, IL	20.52
06/28/02		Lexis	170.92
07/01/02		Lexis	41.22
07/01/02	85	Photocopies	12.75
07/01/02	3	Photocopies	0.45

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Date	Qty	Description	Amount
07/01/02	60	Photocopies	9.00
07/01/02	133	Photocopies	19.95
07/02/02		Lexis	41.21
07/02/02	181	Photocopies	27.15
07/02/02	66	Photocopies	9.90
07/02/02	2	Photocopies	0.30
07/02/02	31	Photocopies	4.65
07/03/02	2	Facsimile	2.00
07/03/02		Lexis	149.78
07/03/02		Long Distance Telephone: 7243871869	0.16
07/03/02		Long Distance Telephone: 3124254103	0.07
07/03/02		Long Distance Telephone: 3124254103	1.14
07/03/02	3	Photocopies	0.45
07/03/02	72	Photocopies	10.80
07/03/02	51	Photocopies	7.65
07/05/02		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-302-34187; DATE: 7/5/2002 - Courier, Acct. 0802-0410-8 06-26; Nick Cummings Chicago, IL	16.26
07/08/02		Lexis	41.22
07/08/02		Long Distance Telephone: 4105314203	1.53
07/09/02	4	Facsimile	4.00
07/09/02		Other Expenses: VENDOR: Lex Solutio Corp.; INVOICE#: 6485; DATE: 7/9/2002 - Create CD-Rom	120.00
07/09/02	4	Photocopies	0.60
07/09/02	23	Photocopies	3.45
07/09/02	1,897	Photocopies	284.55

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Date	Qty	Description	Amount
07/09/02	100	Photocopies	15.00
07/09/02	318	Photocopies	47.70
07/09/02	248	Photocopies	37.20
07/09/02	434	Photocopies	65.10
07/10/02		Long Distance Telephone: 2122529700	0.61
07/10/02		Long Distance Telephone: 4065232500	0.17
07/10/02		Long Distance Telephone: 5613621533	4.51
07/10/02	16	Photocopies	2.40
07/10/02	5	Photocopies	0.75
07/10/02	3	Photocopies	0.45
07/10/02	1,304	Photocopies	195.60
07/11/02	2	Facsimile	2.00
07/11/02		Long Distance Telephone: 8568574010	0.19
07/11/02		Long Distance Telephone: 4065232543	2.31
07/11/02		Long Distance Telephone: 4065232543	0.16
07/11/02		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-302-70211; DATE: 7/11/2002 - Courier, Acct. 0802-0410-8 07-03; William Corcoran Columbia, Md	7.49
07/11/02		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-302-70211; DATE: 7/11/2002 - Courier, Acct. 0802-0410-8 07-02; Richard Bartelt Chicago, IL (6 pieces)	179.38
07/11/02	37	Photocopies	5.55
07/11/02	100	Photocopies	15.00
07/11/02	78	Photocopies	11.70
07/11/02	82	Photocopies	12.30
07/11/02	2	Photocopies	0.30
07/12/02	5	Facsimile	5.00



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Date	Qty	Description	Amount
07/12/02		Long Distance Telephone: 5613621533	0.09
07/12/02		Long Distance Telephone: 8568574010	0.36
07/12/02		Long Distance Telephone: 5613621533	1.70
07/12/02	8	Photocopies	1.20
07/12/02	329	Photocopies	49.35
07/12/02	80	Photocopies	12.00
07/12/02	1	Photocopies	0.15
07/12/02	6	Photocopies	0.90
07/12/02	1	Tab Stock: 1 Tab Stock	0.05
07/12/02	1	Velo Binding: 1 Velo Binding	1.00
07/15/02		Long Distance Telephone: 5613621533	2.96
07/15/02	137	Photocopies	20.55
07/15/02	42	Photocopies	6.30
07/15/02	2	Photocopies	0.30
07/15/02	100	Photocopies	15.00
07/16/02	6	Color Photocopies: 6 Color Photocopies	3.90
07/16/02	2	Facsimile	2.00
07/16/02	3	Facsimile	3.00
07/16/02	4	Facsimile	4.00
07/16/02	4	Facsimile	4.00
07/16/02		Long Distance Telephone: 9192809479	0.33
07/16/02		Long Distance Telephone: 7243871869	0.96
07/16/02		Long Distance Telephone: 4062933964	0.07
07/16/02		Long Distance Telephone: 7036840123	0.88
07/16/02		Long Distance Telephone: 3609416302	0.07

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Date	Qty	Description	Amount
07/16/02		Long Distance Telephone: 7036840123	0.24
07/16/02	9	Photocopies	1.35
07/16/02	17	Photocopies	2.55
07/17/02	4	Facsimile	4.00
07/17/02	4	Facsimile	4.00
07/17/02	327	Photocopies	49.05
07/17/02	1	Photocopies	0.15
07/17/02	56	Photocopies	8.40
07/17/02	260	Photocopies	39.00
07/17/02	43	Photocopies	6.45
07/18/02		Long Distance Telephone: 4156691489	1.75
07/18/02		Long Distance Telephone: 3124254125	0.07
07/18/02		Long Distance Telephone: 5613621533	0.11
07/18/02	62	Photocopies	9.30
07/18/02	49	Photocopies	7.35
07/18/02	1	Photocopies	0.15
07/18/02		Travel Expense: VENDOR: Majest International; INVOICE#: 18657; DATE: 7/18/2002 - Airfare, 8/13-8/14/02, Denver Salt Lake City Salt Lake City Kalispell Kalispell Salt Lake City Salt Lake City Denver, K. Lund	1,096.50
07/18/02		Travel Expense: VENDOR: Katheryn J. Coggon; INVOICE#: 061202B; DATE: 7/26/2002 - Travel expense 07/16-07/18/02 Libby, MT for site tour, meeting with client and experts - Auto Rental	259.03
07/18/02		Travel Expense: VENDOR: Katheryn J. Coggon; INVOICE#: 061202B; DATE: 7/26/2002 - Travel expense 07/16-07/18/02 Libby, MT for site tour, meeting with client and experts - Hotel	141.45

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Date	Qty	Description	Amount
07/18/02		Travel Expense: VENDOR: Katheryn J. Coggon; INVOICE#: 061202B; DATE: 7/26/2002 - Travel expense 07/16-07/18/02 Libby, MT for site tour, meeting with client and experts - Meals	36.00
07/19/02	3	Facsimile	3.00
07/19/02	4	Facsimile	4.00
07/19/02		Long Distance Telephone: 5613621533	1.99
07/19/02		Long Distance Telephone: 4065232543	0.10
07/19/02		Long Distance Telephone: 4067525666	0.02
07/19/02		Long Distance Telephone: 4067516003	0.12
07/19/02		Long Distance Telephone: 5613621533	3.81
07/19/02		Long Distance Telephone: 3124254103	1.65
07/19/02	2	Photocopies	0.30
07/19/02	94	Photocopies	14.10
07/19/02	49	Photocopies	7.35
07/19/02	49	Photocopies	7.35
07/19/02	442	Photocopies	66.30
07/19/02		Travel Expense: VENDOR: Majest International; INVOICE#: 18675; DATE: 7/19/2002 - Airfare, 8/13-8/16/02, Denver Salt Lake City Salt Lake City Kalispell Kalispell Salt Lake City Salt Lake City Denver	1,096.50
07/21/02		Lexis	211.17
07/21/02		Other Expenses: VENDOR: Attorneys Service Center, Inc.; INVOICE#: 16364; DATE: 7/22/2002 - Deposition transcript of Eric Michael Moeller on 06/21/02	203.10
07/22/02	3	Facsimile	3.00
07/22/02	3	Facsimile	3.00
07/22/02		Lexis	259.45
07/22/02		Lexis	153.86

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07/22/02		Other Expenses: VENDOR: Herceglie, Angela; INVOICE#: 8/6/2002; DATE: 7/22/2002 - For traslation services. MFLoyd	550.00
07/22/02	3	Photocopies	0.45
07/22/02	2	Photocopies	0.30
07/22/02	162	Photocopies	24.30
07/22/02	1	Photocopies	0.15
07/23/02	2	Facsimile	2.00
07/23/02	2	Facsimile	2.00
07/23/02	2	Facsimile	2.00
07/23/02	2	Facsimile	2.00
07/23/02		Lexis	117.65
07/23/02		Long Distance Telephone: 5613621532	0.11
07/23/02		Long Distance Telephone: 4065232543	5.84
07/23/02		Long Distance Telephone: 6174984459	0.18
07/23/02		Long Distance Telephone: 3026525340	3.95
07/23/02		Outside Courier	6.50
07/23/02	28	Photocopies	4.20
07/23/02	2	Photocopies	0.30
07/23/02	1	Photocopies	0.15
07/23/02	3	Photocopies	0.45
07/24/02	2	Facsimile	2.00
07/24/02		Lexis	132.98
07/24/02		Lexis	157.89
07/24/02		Long Distance Telephone: 5039457200	0.79
07/24/02		Long Distance Telephone: 2537795588	0.10
07/25/02	2	Facsimile	2.00

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Date	Qty	Description	Amount
07/25/02	2	Facsimile	2.00
07/25/02		Long Distance Telephone: 4065232500	0.84
07/25/02		Long Distance Telephone: 6174263501	0.22
07/25/02		Long Distance Telephone: 4108593786	0.15
07/25/02		Long Distance Telephone: 4107426316	0.06
07/25/02		Long Distance Telephone: 4107426913	0.01
07/25/02		Long Distance Telephone: 4105314751	0.31
07/25/02		Long Distance Telephone: 4102475031	0.10
07/25/02		Long Distance Telephone: 4102475031	0.11
07/25/02		Long Distance Telephone: 5613621533	2.03
07/25/02		Long Distance Telephone: 4062933964	0.04
07/25/02		Long Distance Telephone: 7036840123	0.15
07/25/02	4	Photocopies	0.60
07/25/02	31	Photocopies	4.65
07/26/02		Travel Expense: VENDOR: Majest International; INVOICE#: 18779; DATE: 7/26/2002 - Airfare, 8/21-8/22/02, Denver Missoula Missoula Denver, K. Coggon	697.00
07/29/02	21	Facsimile	21.00
07/29/02	6	Photocopies	0.90
07/29/02	14	Photocopies	2.10
07/30/02	3	Facsimile	3.00
07/30/02	5	Facsimile	5.00
07/30/02		Long Distance Telephone: 7036840123	0.21
07/30/02		Long Distance Telephone: 3026525340	1.81
07/30/02		Long Distance Telephone: 4062933964	0.07
07/30/02		Long Distance Telephone: 4065232543	0.12

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**Itemized Disbursements**

Date	Qty	Description	Amount
07/30/02		Long Distance Telephone: 5613621506	0.52
07/30/02		Long Distance Telephone: 4065438017	1.39
07/30/02	28	Photocopies	4.20
07/30/02	15	Photocopies	2.25
07/30/02	3	Photocopies	0.45
07/30/02	90	Photocopies	13.50
07/30/02	43	Photocopies	6.45
07/30/02	7	Photocopies	1.05
07/31/02	4	Color Photocopies: 4 Color Photocopies	2.60
07/31/02	5	Facsimile	5.00
07/31/02	5	Facsimile	5.00
07/31/02		Long Distance Telephone: 4065232543	0.09
07/31/02		Long Distance Telephone: 4065232543	1.03
07/31/02		Long Distance Telephone: 7812706600	0.04
07/31/02		Long Distance Telephone: 4065232543	1.19
07/31/02		Outside Courier	6.50
07/31/02	365	Photocopies	54.75
07/31/02	92	Photocopies	13.80
07/31/02	2	Photocopies	0.30
07/31/02	2	Photocopies	0.30
07/31/02	4	Photocopies	0.60
07/31/02	2	Photocopies	0.30
07/31/02	1	Photocopies	0.15
07/31/02	2	Photocopies	0.30
07/31/02	96	Photocopies	14.40

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**Itemized Disbursements**

Date	Qty	Description	Amount
07/31/02	246	Photocopies	36.90
07/31/02	530	Photocopies	79.50
07/31/02	80	Photocopies	12.00
07/31/02	2	Photocopies	0.30
07/31/02	433	Photocopies	64.95
07/31/02	1,340	Photocopies	201.00
07/31/02	670	Photocopies	100.50

**Total Disbursements:****\$ 10,276.76****Disbursement Summary**

Photocopies	\$ 1,772.10
Facsimile	100.00
Long Distance Telephone	122.73
Outside Courier	317.43
Travel Expense	4,136.14
Lexis	2,947.71
Other Expenses	873.10
Color Photocopies	6.50
Velo Binding	1.00
Tab Stock	0.05
<b>Total Disbursements:</b>	<b>\$ 10,276.76</b>

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**Regarding: Libby - Cost Recovery Case**

Itemized Services				
Date	Tkpr Task	Description	Hours	Value
07/15/02	KWL	Begin review of Yang documents for deposition defense.	2.00	\$ 700.00
07/16/02	KWL	Meeting with KJCoggon re case status and strategy (.40); review e-mail re expert issues (1.10); review Julie Yang documents for deposition defense (3.00).	4.50	1,575.00
07/17/02	KWL	Review case status and develop ongoing strategy outline for discussion with client.	3.00	1,050.00
07/18/02	KWL	Prepare for trial team meeting (1.00); coordinate trial team meeting re case status and strategy (.70); review deposition outlines for six EPA contractors (3.00).	4.70	1,645.00
07/25/02	JLS	Draft and edit deposition notices for Lybarger, CDM, Middleton and Dearwent (3.20).	3.20	400.00
08/01/02	KWL	Coordinate Grace trial team meeting (1.70); telephone conference with KJCoggon re status of case and scheduling (.30); preparation for Julie Yang deposition (2.00).	4.00	1,400.00
08/01/02	JDM	Prepare for team meeting (0.7); attend team meeting (1.7); meet with EESTevenson and KJCoggon re U.S. expert reports (0.2); outline ATSDR deposition questioning and other medical deposition preparation (5.0); review and analyze U.S. expert reports (4.5); conference with DPWall re ATSDR documents for depositions (0.2).	12.30	3,690.00
08/01/02	CLN	Attend portion of trial team meeting to discuss case strategies, schedule and discovery.	1.50	450.00
08/01/02	LSD	Final revisions to Michael Hutchinson memorandum re additional documents mentioned by Hutchinson (.30); begin final review of Chris Weis documents (3.0).	3.30	990.00



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**Itemized Services**

Date	Tkpr Task	Description	Hours	Value
08/01/02	KJC	Draft letter to H. Kukis re privilege log (0.20); telephone conference with KWLund re status of case projects and schedule (0.30); address inquiries and issues re document databases (0.20); coordinate deposition schedule and strategies (0.90); review and respond to e-mail and questions re document review and coding (.60); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.50); review and respond to e-mail and follow up on document scanning and coding from EPA production (0.40); respond to questions from client and team re facts and documents (0.20); team meeting re case strategies, schedule, and discovery (1.70); address staffing, space, and logistics for increased document review effort (1.30); telephone conference with R. Emmett re experts, schedule, and case issues (0.50); review and forward US expert reports as appropriate (2.20); exchange messages with M. Cohn re J. Yang deposition and document production (0.10); leave message for J. Freeman re expert documents and depositions (0.10).	9.20	2,530.00
08/01/02	MWW	Review, categorize and code documents produced by EPA for relevance to various case issues.	1.90	560.50
08/01/02	JD	Review coding instructions and list of issue codes.	0.50	130.00
08/01/02	EES	Trial team case strategy meeting regarding discovery and trial preparation issues (1.7); review Charles Young expert report (2.2); review Wiley Wright expert report (1.4); review Dr. Whitehouse's expert report (0.9); prepare for Charles Young EPA indirect cost deposition (2.9).	9.10	2,548.00
08/01/02	GM	Review, categorize and code documents produced by EPA for relevance to various case issues.	2.40	540.00
08/01/02	DPW	Review, categorize and code documents produced by EPA for relevance to various case issues.	4.10	758.50

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**Itemized Services**

Date	Tkpr Task	Description	Hours	Value
08/01/02	PRS	Review news articles for JDMcCarthy re Alan Whitehouse deposition (1.8).	1.80	225.00
08/01/02	MBF	Research to locate Lybarger and Middleton CVs for JDMcCarthy (.50); review, categorize and code documents produced by EPA for relevance to various case issues (1.00).	1.50	135.00
08/02/02	KWL	Review final expert report re cleavage fragment issues (3.50); conferences with KJCoggon re status of various case projects (.50).	4.00	1,400.00
08/02/02	JDM	Prepare ATSDR deposition outlines (6.00); review documents received from ATSDR (1.70).	7.70	2,310.00
08/02/02	LSD	Attend training session on working with Lotus Notes and re document review/coding issues (1.30); review, categorize and code documents produced by EPA for relevance to various case issues (.50).	1.80	540.00
08/02/02	KJC	Coordinate deposition schedule and strategies (0.50); address billing issues from vendors and experts (0.10); review and respond to e-mail and questions re document review and coding (0.40); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (2.30); review and respond to e-mail and follow up on document scanning and coding from EPA production (.60); respond to questions from client and team re facts and documents (0.70); train new staff re document review (1.30); address staffing and organization for document review (0.40); conferences with KWLund re status of various case projects (0.50); review expert reports (0.90).	7.70	2,117.50
08/02/02	TRB	Attend training session on working with Lotus Notes and re document review/coding issues.	1.30	390.00